UNITED STATES DISTRICT COUR SOUTHERN DISTRICT OF NEW Y	ORK	DORIGINAL
UNITED STATES OF AMERICA	X	
v.		Affirmation in Support of Application
TODD KOZEL,		for Order of Continuance
<i>Defendant.</i>		18 Mag. 10663
State of New York)	
County of New York	: ss.:	
Southern District of New York)	

SARAH E. PAUL, pursuant to Title 28, United States Code, Section 1746, hereby declares under penalty of perjury:

- 1. I am an Assistant United States Attorney in the Office of Geoffrey S. Berman, United States Attorney for the Southern District of New York. I submit this affirmation in support of an application for an order of continuance of the time within which an indictment or information would otherwise have to be filed, pursuant to 18 U.S.C. § 3161(h)(7)(A).
- 2. The defendant was charged in a complaint dated December 14, 2018 with violations of Title 18, United States Code, Sections 1343, 1349, and 1956(h), as well as Title 18, United States Code, Section 2.
- 3. The defendant was arrested on December 18, 2018 and presented before Magistrate Judge Debra Freeman on the same day. The defendant was released the following day on a set of bail conditions. The defendant is represented by David Meister, Esq.
- 4. Under the Speedy Trial Act, and as set by Judge Freeman during the defendant's presentment, the Government initially had until January 17, 2019 to charge the defendant by

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indictment or information. On January 17, 2019, the Honorable Sarah Netburn, United States

Magistrate Judge, entered an Order of Continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A),

extending the time within which an indictment or information would otherwise have had to be

filed in this case until February 18, 2019. Because February 18, 2019 was a federal holiday, the

relevant filing date is today, February 19, 2019.

5. Mr. Meister and I have had discussions regarding a possible disposition of this case.

The negotiations have not been completed and we plan to continue our discussions, but do not

anticipate a resolution before the deadline under the Speedy Trial Act expires on February 19,

2019.

6. Therefore, the Government is requesting a 30-day continuance until March 21, 2019,

to continue the foregoing discussions and reach a disposition of this matter. I have communicated

with Mr. Meister, who specifically consented to this request. This application has also been

approved by Andrew Dember, Deputy Chief of the Criminal Division.

7. For the reasons stated above, the ends of justice served by the granting of the requested

continuance outweigh the best interests of the public and the defendant in a speedy trial.

Dated: New York, New York February 19, 2019

Assistant United States Attorney

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